IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

AIDA ELZAGALLY, *et al.,*	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:19-cv-00853 (LMB/MSN)
	)	
KHALIFA HIFTER,	)	
	)	
Defendant.	)	
	)	
MUNA AL-SUYID, *et al.,*	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:20-cv-00170 (LMB/MSN)
	)	
KHALIFA HIFTER,	)	
	)	
Defendant.	)	
	)	
ALI ABDALLA HAMZA, *et al.,*	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:20-cv-01038 (LMB/MSN)
	)	
KHALIFA HIFTER,	)	
	)	
Defendant.	)	
	)	

JOINT MOTION TO CONSOLIDATE RELATED
CASES FOR DISCOVERY AND LIMITED PRETRIAL PROCEEDINGS

All Parties, hereby move this Court to consolidate *Aida Elzagally, et al., v.*

Khalifa Hifter, Case No. 1:19-cv-00853 (LMB/MSN) ("*Elzagally*"), *Muna al-Suyid, et*

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al., v. Khalifa Hifter, Case No. 1:20-cv-00170 ("*al-Suyid*"), and *Ali Abdalla Hamza, et al., v. Khalifa Hifter*, Case No. 1:20-cv-01038 (LMB/MSN) ("*Hamza*") for the limited purposes of discovery and pretrial matters, excluding dispositive motions by Parties, pursuant to Federal Rule of Civil Procedure 42(a).

Rule 42(a) permits a court to consolidate actions pending before it if those actions involve "a common question of law or fact." Fed. R. Civ. P 42(a). That standard "is an expansive one, allowing consolidation of the broad range of cases brought in federal court." 8 Moore's Federal Practice § 42.10[1][a] (3d. ed.).

All Parties, jointly and through their respective counsel, hereby respectfully request this Court to consolidate these cases for purposes of discovery and pretrial matters, excluding dispositive motions, for the following reasons:

1. The cases share common questions of law and fact. Here, the *Hamza* Plaintiffs filed suit against Mr. Hifter on September 3, 2020. The *al-Suyid* Plaintiffs filed suit against Mr. Hifter on February 18, 2020. The *Elzagally* Plaintiffs filed suit against Mr. Hifter on June 26, 2019. Each of these lawsuits pending against Mr. Hifter pertain to allegations of substantially similar actions, conduct, or damages within a similar timeframe and location and concerning violations of the same statute (the TVPA).

2. Consolidation will reduce the burden on the Parties and on this Court regarding discovery and limited pretrial matters and conserve judicial resources.

3. Consolidation will expedite the resolution of issues between the Parties to sharpen the issues and expedite the resolution of these cases.

4. The Parties all consent to this consolidation.

WHEREFORE, to promote judicial economy and the expeditious disposition of these cases and at the Court's encouragement, the Parties respectfully request this Court limitedly consolidate Case No. 1:19-cv-00853, Case Nos. 1:20-cv-00170 and 1:20-cv-01038.

Dated: October 22, 2021   Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on October 22, 2021, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

Dated: October 22, 2021

/s/ Lindsay R. McKasson
Lindsay R. McKasson

Attorney for Khalifa Hifter